

# **Exhibit A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL CREDIT UNION  
ADMINISTRATION BOARD, etc.,

Plaintiff,

v.

MORGAN STANLEY & CO., et al.,

Defendants.

And other NCUA Actions.

Case No. 13-cv-6705 (DLC)  
Case No. 13-cv-6719 (DLC)  
Case No. 13-cv-6721 (DLC)  
Case No. 13-cv-6726 (DLC)  
Case No. 13-cv-6727 (DLC)  
Case No. 13-cv-6731 (DLC)  
Case No. 13-cv-6736 (DLC)

**UNITED STATES DISTRICT COURT  
DISTRICT OF KANSAS**

NATIONAL CREDIT UNION  
ADMINISTRATION BOARD, etc.,

Plaintiff,

v.

RBS SECURITIES, INC., f/k/a  
GREENWICH CAPITAL MARKETS, INC.,  
et al.,

Defendants.

And other NCUA Actions.

Case No. 11-cv-2340 & 2649 (JWL)  
Case No. 12-cv-2591 (JWL)  
Case No. 12-cv-2648 (JWL)  
Case No. 13-cv-2418 (JWL)

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

NATIONAL CREDIT UNION  
ADMINISTRATION BOARD, etc.,

Plaintiff,

v.

RBS SECURITIES, INC., f/k/a  
GREENWICH CAPITAL MARKETS, INC.,  
et al.,

Defendants.

Case No. 11-cv-5887 (GW)

Case No. 11-cv-6521 (GW)

And other NCUA Action.

STIPULATION AND AGREEMENT REGARDING PRODUCTION  
OF DEPOSITION TRANSCRIPTS IN  
NATIONAL CREDIT UNION ADMINISTRATION BOARD V. SIRAVO

WHEREAS, Defendants have requested the deposition transcripts and exhibits from the lawsuit entitled *National Credit Union Administration Board v. Siravo, et al.*, CV10-01597 (C.D. Cal.) ("*Siravo*");

WHEREAS, paragraph 10(d) of the Master Discovery Protocol provides, among other things, that certain transcripts of testimony and exhibits "shall be treated as if taken in the Actions" and that "[t]he parties shall endeavor to not subject witnesses to the same questioning for which a transcript was previously provided";

WHEREAS, Defendants' position is that the *Siravo* case is not an "RMBS matter" as that term is used in Paragraph 10(d) of the Master Discovery Protocol, this stipulation does not operate as a concession otherwise, and Defendants should not be required to produce transcripts

of testimony and exhibits taken in actions other than from RMBS matters as specified in Paragraph 10(d) of the Master Discovery Protocol; and

WHEREAS, NCUA's position is that Defendants should produce similar materials from matters involving RMBS in which Defendants or one of their officers or employees was a party, and reserves the right to seek such materials pending completion of the parties' meet and confer discussions.

NOW THEREFORE, the Parties hereby stipulate, through their attorneys of record, that the deposition transcripts and exhibits from the *Siravo* matter shall be deemed to be produced pursuant to, and subject to the provisions of, paragraph 10(d) of the Master Discovery Protocol.

The Parties hereby further stipulate that NCUA shall produce such transcripts on or before December 10, 2014.

Dated: December 2, 2014

Respectfully submitted,

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